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EX PARTE

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

**Re: WC Docket No. 02-314 – Application of Qwest
Communications International Inc. for
Authorization to Provide In-Region, InterLATA
Service in the States of Colorado, Idaho, Iowa,
Montana, Nebraska, North Dakota, Utah,
Washington and Wyoming**

Dear Ms. Dortch:

Qwest Communications International Inc. (“Qwest”) submits this filing in response to two questions from Commission staff pertaining to conversions.

Commission staff first asked Qwest to describe the ordering and provisioning process for UNE-P orders. In particular, staff requested information on how many service orders are created in the course of converting an end user to UNE-P service and why a CLEC may experience a loss of dial tone with some conversion orders.

In responding to this (and the second) question, Qwest will assume that the “UNE-P” orders referred to are UNE-P POTS orders. The number of service orders created when provisioning UNE-P POTS service depends in part on the service to and from which the end user is converting. Ordinarily, conversions from Retail or resale POTS to a UNE-P POTS account require a single “C” (Change) order. If the product categories are changing or the CLEC has requested a partial conversion, more than a single “C” order may be needed. But conversions requiring multiple orders are few.

If multiple service orders are needed to convert an end user to UNE-P POTS service and those service orders become disassociated during the provisioning process, the end user may experience a temporary loss of dial tone (until all of the service orders are provisioned).¹ But this happens very infrequently. In fact, an analysis of Qwest's call center database information from the recent August 2002 through September 2002 period shows that only 0.08% of conversion orders experienced such an outage.² Given this very small volume of conversion orders, such outages cannot be deemed to have a competitively significant impact on CLECs.

In an ex parte filing, WorldCom cites to a recent Cap Gemini Ernst & Young ("CGE&Y") report stating that end users temporarily lost dial tone on the day of conversion for 1.6% of UNE-P orders as a result of disassociation.³ WorldCom then inexplicably uses this figure as a basis for its inflated – and unsubstantiated – claim that "[t]wenty percent of the orders for which Qwest created an N and a D order resulted in a loss of dial tone."⁴ CGE&Y's analysis did not even come close to this figure. Moreover, as noted above, Qwest's own analysis calculates this figure at far less than one percent. Both CGE&Y's and Qwest's figures are within the acceptable range cited by WorldCom for conversion orders that may result in temporary lost dial tone. That WorldCom was under the impression "that Qwest had a single C process of UNE-P ordering" in every possible instance, simply is irrelevant here.

Commission staff also asked for an update on information Qwest provided in an ex parte filed in the Qwest I proceeding.⁵ In that ex parte, Qwest responded to allegations made by Eschelon regarding disconnect problems associated with conversions from Qwest or Eschelon Centrex 21 to UNE-P or resale POTS. Qwest noted that although under certain circumstances the outage associated with such a conversion could last longer than a minute, that happens infrequently. Qwest recently has determined that between July and September 2002, Eschelon experienced only five out-of-service outages that lasted more than a minute when converting an end user from Centrex 21 to resale or UNE-P POTS.

¹ Also, where a product is changing, there invariably will be a temporary loss of dial tone because the new product cannot be implemented without first removing the old. But this is only for a few seconds and thus does not have a material adverse effect on CLECs.

² See Reply Declaration of Michael G. Williams, WC Docket No. 02-314, at ¶ 35.

³ See WorldCom *Ex Parte*, filed November 6, 2002, at 10.

⁴ See *id.*

⁵ See Qwest 08/08/02a *Ex Parte* at 7.

The 20-page limit does not apply to this filing.

Respectfully submitted,

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